### **REMARKS**

Claims 1-20 are pending. Entry of the amendment is respectfully requested. No new matter has been added. Reconsideration is respectfully requested. The Examiner's comments are appreciated.

## Claim Status

Claims 1-18 were rejected under 35 U.S.C. § 103(a) over Hilton (US 4,275,667).

#### Claim 1

Hilton does not teach or suggest the recited cassette. Hilton's rods (30) can contact the lugs (29) to open the shutter (12) (e.g., Figure 5) regardless of whether the shutter is partly open or closed. It follows that Hilton does not meet the structural attributes of the recited cassette.

Also, there is no valid reason to provide Hilton's lugs (29) with a female receiver, as alleged. There is no evidence that Hilton's rods (30) can slip, as alleged. Conversely, the rods (30) appear to be prevented from vertical movement by being between the wall (1) and the shutter guideways (13, 14). Hilton's horizontally paired rods (30) are further prevented from horizontal movement by the side panels (3). Hilton's corresponding horizontally paired holes (for rods 30) in the frontal edge (2) would further act to prevent the alleged slippage.

Applicants respectfully traverse the Official notice assertion on the basis that it is not supported by any reference to prior art, especially a prior art showing of a male/female connection of a male rod and a female cassette lug for use in Hilton, as alleged.

The Office has not established a *prima facie* case of obviousness. It would not have been obvious to one having ordinary skill in the art to have modified Hilton as alleged to have produced the recited invention.

### Claim 16

Hilton does not teach or suggest a cassette *door* having an opening that can receive therein the head of a push pin. Nor does Hilton teach or suggest a lip face that can be pushed against the body of the push pin to cause opening of the door during insertion of the cassette. Nor does Hilton teach or suggest a relationship between the open/closed position of a cassette door and the ability of the door's guide channel to receive and guide a pin head toward the door's opening. The Office has not established a *prima facie* case of obviousness.

### Claim 20

Hilton does not teach or suggest a cassette door lip that can engage a portion of a push pin while the door opening mates with another portion of a push pin. Nor does Hilton teach or suggest the ability to fully open a cassette door be dependent on the magnitude of the initial openness of the door during insertion of the cassette into the machine. As previously discussed, Hilton's rods (30) can fully open the shutter (12) regardless of whether the shutter was initially partly open or fully closed. The Office has not established a *prima facie* case of obviousness.

#### **The Dependent Claims**

Each of the dependent claims depends directly or indirectly from an independent claim.

Thus, it is asserted that the dependent claims are allowable on at least the same basis.

Furthermore, each of the dependent claims additionally recites specific features and relationships that patentably distinguish the claimed invention over the applied art. The references do not teach or suggest the features and relationships that are specifically recited in the dependent claims. Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features and relationships.

# **Conclusion**

Applicants respectfully submit that this application is in condition for allowance.

The undersigned will be happy to discuss any aspect of the Application by telephone at the Office's convenience.

Respectfully submitted,

Ralph E. Jocke

Reg. No. 31,029

WALKER & JOCKE 231 South Broadway Medina, Ohio 44256

(330) 721-0000